

Farber

- **LOW-RISE RESIDENTIAL “STANDARD” WATER HEATER:** Consider allowing tankless gas-fired water heaters with electronic ignition to meet the requirements of a “standard” system. If these systems are as energy-efficient as the manufacturer’s claim, Title 24 should not create an impediment to their use. Unless it imposes an energy penalty, allow any number of tankless systems (with electronic ignitions) per residence to meet the definition of “standard” system (unless the system has recirculation).

In the RFQ for the a consultant for the 2003/2005 Standards, the CEC correctly points out that high-efficiency storage water heaters (40 and 50 gallons) cost about the same as low-efficiency water heaters, and therefore act to weaken the residential standards. The RFQ suggests a possible remedy of requiring water heating energy requirements to be met independently of the space heating and cooling energy budget. While this remedy is definitely worth consideration, it would not produce an incentive to use tankless gas water heaters. Could the ACM rules divorce the water heater energy from the space conditioning energy when a storage-type water heater is used, but continue the current practice of combining all energy when a tankless water heater is used? Or perhaps another type of incentive could be adopted to encourage use of tankless water heaters.